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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")

respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm the

final decision of the Commissioner, due on December 18, 2015, by 30 days, through and including January 18, 2016.

An extension of time is needed to prepare Defendant's Cross-Motion to Affirm because the Commissioner re-assigned the briefing of this matter on Friday, December 4, 2015 to D. Adam Lazar, an attorney who is managing a new caseload. This request is made in good faith with no intention to unduly delay the proceedings.

Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion, on December 9, 2015.

Respectfully submitted this 9th day of December, 2015.

Date: December 9, 2015

GERALD M. WELT
Attorney at Law: 1575

By: /s/* Marc V. Kalagian
MARC V. KALAGIAN
Attorney at Law: 4460
*by email authorization on December 9, 2015

Attorneys for Plaintiff

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By: /s/ Urmila Taylor
URMILA TAYLOR
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OF COUNSEL:
D. ADAM LAZAR, CSBN 237485
Assistant Regional Counsel, Region IX

Attorneys for Defendant

IT IS SO ORDERED.

Date: _____
December 14, 2015

By: 
THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Urmila Taylor, certify that the following individuals were served with a copy of the **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S CROSS-MOTION TO AFFIRM (Second Request)** on the date and via the method of service identified below:

CM/ECF:

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GERALD M. WELT
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Date: December 9, 2015

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By: /s/ Urmila Taylor
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